

National Naval Medical Center

Draft Environmental Impact Statement, Base Realignment and Closure Actions

DPS, Land Development Division Comments, January 15, 2008

Right-of-Way Permitting:

The report identifies several impacted roadways and intersections in the transportation section. Most of them are under the jurisdiction of SHA. The report did indicate most of these intersections would have required improvement, without the BRAC improvement generated traffic, either now or by year 2011.

- If any improvements are necessary, they will be most likely permitted through SHA or County CIP projects. Thus, both scenarios will not require any ROW permitting actions from DPS.
- DPWT has extensive planning comments on the report and they are being coordinated through their Deputy Director of Special Projects, Mr. Mohammad Siddique.

Water Resources Permitting:

- Sections 3.1 and 3.2 included thorough discussions of existing conditions regarding geology, topography, soils and water resources. DEP may have additional information concerning the existing condition of the unnamed tributary of Stoney Creek that traverses the property.
- Sections 4.1 and 4.2 correctly identify MDE as the agency that will review sediment control and stormwater management (SWM) plans for use in development of the property. Both sections accurately describe the impact of each alternative of development. Section 4.2 also describes, in detail, the required compliance with MDE regulations, the MDE Stormwater Design Manual, and the Maryland SWM Act of 2007. At this stage, all discussion is not design specific.
- "Green engineering" (green roofs, parking lot filter strips, pervious pavements) was mentioned, which the County supports. However, it could be placed a little more prominently in the report (currently toward the end of discussion in Section 4.2.1.1). These are preferred practices in the MDE 2007 Stormwater Act.
- Both Sections 3.2 and 4.2 contain discussions about requirements for areas of redevelopment. Compliance with MDE standards is proposed. However, those areas of redevelopment should consider compliance with current County law, which is more stringent than MDE standards. County SWM requirements for redevelopment match those for new development, except that recharge is not required. MDE standards only require treatment or imperviousness reduction (or a combination thereof) of 20% of a redevelopment site. County standards require treatment (including imperviousness reduction) of the entire redevelopment site. All private and local government development or redevelopment in the surrounding area is currently governed by the more stringent County standards. This project should comply as well.